

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

DOUGLAS F. CARLSON
RESPONSE TO INTERROGATORIES
OF THE UNITED STATES POSTAL SERVICE (USPS/DFC-1-9)

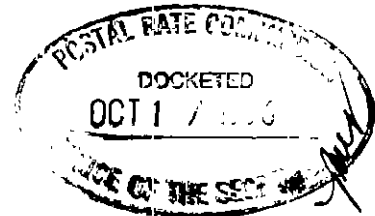
October 14, 1996

I, Douglas F. Carlson, hereby provide my responses to the interrogatories of the United States Postal Service (USPS/DFC-1-9). The interrogatories were filed on October 4, 1996.

Each interrogatory is stated verbatim and is followed by my response.

Dated: October 14, 1996


DOUGLAS F. CARLSON



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USPS/DFC-1. Please refer to your testimony at pages 2 and 3.

(a) Why did you obtain post office box service, rather than carrier delivery, in Walnut Creek?

(b) Why did you obtain post office box service, rather than carrier delivery, in Davis?

(c) Was the only reason you obtained a post office box in Emeryville to test the delivery service there? If not, please explain fully.

(d) Why did you obtain post office box service, rather than carrier delivery, in Berkeley?

(e) Have you obtained post office box service in any other post office? If so, please list each post office, and explain why you obtained post office box service.

(f) What size boxes have you used at each of the locations where you have used post office box service? If you have used other than size 1 boxes, please explain the circumstances that led to your use of larger boxes.

RESPONSE:

(a) I obtained box service in Walnut Creek because:

(i) The Postal Service is one of my hobbies, and I enjoy going to the post office every day to pick up my mail;

(ii) A post-office box provides better security for my mail than carrier delivery. When large articles arrive at my post-office box, the articles are held for pickup at the window (or, at some offices, placed in a secure locker). In contrast, large articles that arrive at cluster mailboxes in apartments typically are left out in the open near the mailboxes, increasing the risk of theft. Also, occasionally thieves burglarize postal vehicles that are parked on city streets. My mail probably is safer from theft when it is delivered to a post-office box;

(iii) By using a post-office box, I can avoid revealing my street address to my correspondents. Thus, I can more effectively protect my privacy;

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(iv) A post-office-box address usually is easier to communicate to people over the telephone than a street address, since I can avoid spelling out the street name;

(v) Often I can obtain my mail earlier in the day from a post-office box than through carrier delivery. Also, the Walnut Creek post office delivered mail to post-office boxes on non-widely-observed holidays, such as Martin Luther King Jr.'s Birthday, Presidents Day, Columbus Day, and Veterans Day.

(b) Please see my response to USPS/DFC-1(a).

(c) When I decided that I might like to move to Emeryville, I obtained a post-office box for the sole purpose of testing delivery service. I determined from just two weeks of testing that delivery service was so inconsistent that I could never rely on the box in Emeryville for receiving my mail. In addition, I decided that the lobby hours were too short.

(d) Since I do not reside in Berkeley, I am not eligible for carrier delivery in Berkeley.

(e) I have had post-office boxes at the following offices:

Berkeley, CA (Sather Gate Station)--I used a post-office box during my four years at UC Berkeley, from 1986 to 1990. I obtained box service for the reasons described in my response to USPS/DFC-1(a). In addition, since I lived in university residence halls, I did not want non-USPS employees to handle and sort my mail. I also wanted one mailing address for the entire four years; indeed, I had had four different street addresses by the time I graduated.

Seattle, WA (University Station)--I attended summer session at the University of Washington. I obtained box

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service for the reasons described in my response to USPS/DFC-1(a). In addition, since I lived in a university residence hall, I did not want non-USPS employees to handle and sort my mail.

Minneapolis, MN (Riverside Station)--I was considering attending law school at the University of Minnesota. During my exploratory visit to Minneapolis, I wanted to be able to test delivery at the post office nearest the campus, since I value box service for the reasons described in my response to USPS/DFC-1(a). I opened a box before I visited Minneapolis according to the procedure described in DMM § 910.2.1. After arriving in Minneapolis, I promptly closed the box when I discovered that the station did not provide delivery or access to the boxes on Saturday (or Sunday). Delivery six days a week is a minimum criterion to me for box service. The University Station on the other side of campus also did not provide delivery or access to the boxes on Saturday (or Sunday).

Concord, CA (Main Office)--I opened the box in Concord because the Walnut Creek post office had a 3-week waiting list for boxes. Since my move from Davis to Walnut Creek was rather sudden, I needed a box for the interim. The Concord post office was not much farther from my residence than the Walnut Creek post office. I desired a box for the reasons described in my response to USPS/DFC-1(a).

Santa Cruz, CA (Main Office)--I opened a box during high school--my first box--just because I was interested in the Postal Service and thought I would enjoy the opportunity to walk to the post office at lunchtime or after school to obtain my mail. By holding a box in Santa Cruz, I learned the advantages of box service, as I described in my response to USPS/DFC-1(a).

(f) Size 1.

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USPS/DFC-2. In any instance when you have used post office box service, was carrier delivery to your residence available as an alternative? If so, to what extent have you received mail both at your residence and your box on the same day? If not, please explain why carrier delivery was not available, to the best of your knowledge.

RESPONSE:

During my first two years in Berkeley, I lived in a campus residence hall. The residence halls used the university's unique 5-digit ZIP Code, and they received their mail directly from a USPS carrier. However, the residence halls did not receive mail delivery on Saturday. During my summer in Seattle at the University of Washington, the residence hall received its mail from the campus mail service, after the mail had been delivered to the university by the USPS. (The university had a unique 5-digit ZIP Code.) Otherwise, I have always been eligible for city carrier delivery.

With only a few narrow exceptions, I have always had all my mail sent to my post-office box. (For example, I will give out my street address for mail-in rebates when the rebates will not accept a post-office box. I also occasionally send test letters to my street address.) Therefore, at my street address I receive mail that is initiated by me only approximately once or twice a week, or approximately five to ten times a month. The other mail that arrives is walk-sequenced advertising mail, such as Advo mailers, or other advertising mail that companies send after my name ends up on mailing lists. (Incidentally, when I lived in Walnut Creek, the carrier never delivered the Advo mailings to the individual cluster mailboxes, despite my complaints to the post office. Instead, he/she dropped the bundled pile below the mailboxes, and within 48 hours the apartment-complex management would discard the

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material.) When I lived in the residence halls, I received only two or three pieces of mail per month, and this mail usually was test letters that I sent to myself. My correspondents knew only my post-office-box address.

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USPS/DFC-3. Please refer to your testimony at page 3, line 28 to page 4, line 2.

(a) Please describe what you value about box service.

(b) Why do you not want to receive your mail at a street address?

RESPONSE:

(a) Please see my response to USPS/DFC-1(a).

(b) Please see my response to USPS/DFC-1(a). In addition, I now have a reason to be concerned about receiving mail at my street address. When I lived in Walnut Creek, my name was on enough mailing lists that I typically received one or two pieces of first-class mail per week. When I moved to Emeryville in August 1995, I filed a change-of-address order. During the first four months of the forwarding order, I received exactly two pieces of forwarded mail, and both pieces I received were test pieces that I had sent to my old address. Many other test letters and postal cards that I sent to my old address disappeared, as did all the other mail that I normally received each week. The carrier supervisors at the Walnut Creek post office were not particularly interested in helping me. I received no response from the postmaster, Layton Hansen, to a letter I sent him pleading for assistance. When I visited Mr. Hansen in person, he was completely indifferent and did not even offer to take any steps to investigate the problem. My guess is that the mail was being delivered to my old address and the new tenant was keeping or discarding the mail. In any event, since a post-office box usually remains out of service for a period of time after a boxholder closes it, I believe that problems with mail forwarding are less common than with street addresses. The fewer problems with mail forwarding at a post-office box represent another reason to use post-office-box service instead of carrier delivery.

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USPS/DFC-4.

(a) Please refer to your testimony at page 4, lines 3 through 8. If the Postal Service's non-resident fee proposal is approved and implemented, would you (1) keep your box service at Berkeley, assuming the fee would include the \$36 non-resident fee, (2) move your box service to Emeryville, assuming the \$36 fee would not apply, or (3) give up box service entirely, and receive all your mail by carrier delivery?

(b) Please answer part (a) assuming, hypothetically, that a free box is available to you in Emeryville.

RESPONSE:

(a) As I discussed in my testimony on page 2, I would not move my box service to Emeryville because the lobby hours are too short and delivery service is unreliable.

I do not know whether I would (1) keep my box in Berkeley and pay the nonresident fee, or (2) give up box service entirely and receive my mail by carrier delivery. I do not intend to give the matter serious thought unless the Commission recommends the nonresident fee and the Board of Governors approves it, as the decision would be a difficult one. On one hand, I would bitterly resent the nonresident fee because I would, in effect, be penalized for living in a city whose post office, through no fault of my own, had lobby hours significantly shorter than the post office in Berkeley or many other cities. The nonresident fee also would penalize me for taking a rational step to avoid the problems in Emeryville. Meanwhile, "resident" boxholders who held boxes in Berkeley next to mine would be paying \$36 less per year for their boxes than I would, simply because they were fortunate enough to live near a post office with longer hours. Moreover, some of these "resident" boxholders probably would be imposing greater costs on the Postal Service than I do, since I abide by all regulations, pick up my mail daily, and pay my fees on time.

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On the other hand, I place a high value on box service, so I might decide that box service would still be worthwhile to me despite the increased total fee (which would happen to include a nonresident surcharge). Note, however, that I place a high value on box service per se, not just nonresident box service. (For a discussion of the value I place on box service, please refer to my response to USPS/DFC-1(a).) While I might place a value on box service high enough to cause me to keep my box in Berkeley even with a nonresident fee, I would place an even higher value on a local box in Emeryville if the Emeryville post office offered lobby hours and delivery service comparable to Berkeley, since the Emeryville post office is more convenient than the Berkeley post office. See my testimony, DFC at page 3, lines 15-23. Thus, the basic fee plus nonresident surcharge would merely be capturing the value to me of post-office-box service in general, not the value to me of nonresident post-office-box service.

(b) Based on my tests and observations over the past 13 months, delivery to my street address in Emeryville is noticeably more reliable than delivery to my Emeryville post-office box. I doubt that I would be willing to receive my mail at a free box in Emeryville when I could pay for better service and longer hours in Berkeley or receive better service for free at my street address in Emeryville. Reliability of delivery is extremely important to me. Moreover, the lobby hours in Emeryville still would be insufficient, even if the box were free. Therefore, I do not believe that availability of a free box in Emeryville would change my answer to (a).

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USPS/DFC-5. Please refer to your testimony at page 4, lines 8 to 11. Please provide all studies or other documentation that you relied upon to determine that box service in Emeryville is less satisfactory than the box service for residents of other cities.

RESPONSE:

Lobby hours are one factor in assessing the quality of box service. Emeryville's lobby hours are significantly shorter than the lobby hours in many other cities, including those in which I have had box service--e.g., Davis, Walnut Creek, Santa Cruz, and Berkeley. Indeed, the Postal Service's own survey revealed that approximately 42 percent of post offices provide 24-hour access to their box lobby. USPS-T-4 at 12 (Table 8B). Surely many more post offices offer longer hours than Emeryville. (For the lobby hours in Emeryville, please see my testimony, DFC at page 2, lines 7-9.)

Reliability of delivery is another important factor in assessing the quality of box service at a particular post office. When I opened my box in Emeryville in May 1995, on approximately 10 to 15 days I mailed at least one test letter or postal card to both my box in Walnut Creek and my new box in Emeryville. For each test, I deposited the test mail simultaneously and always compared similar types of mail--that is, I compared letters with letters, postal cards with postal cards, handwritten mail with handwritten mail, and typewritten mail with typewritten mail. Although I do not have written records of the results of this test, I recall that on approximately 25 to 50 percent of the days, the test letter or postal card addressed to Walnut Creek arrived on time (overnight) while the mail addressed to Emeryville was delayed at least one day. The difference in the levels of service was very obvious. As much as I wanted

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to receive good service in Emeryville, I concluded that serious delivery problems existed in Emeryville.

In June 1995, I opened a box at the main post office in Berkeley. I conducted a similar test, this time comparing Walnut Creek to Berkeley. Reliability of delivery of my test letters and postal cards to Berkeley was at least as good as to Walnut Creek. I then decided to use the box in Berkeley as my address when I moved to Emeryville in August.

Since my move to Emeryville over a year ago, I have continued to test delivery to the Emeryville box periodically. While delivery service seems to have improved somewhat, delivery is always more reliable in Berkeley, as test mail sent to Berkeley will arrive on time when mail sent to Emeryville will not--but rarely, if ever, does the reverse occur.

After I received this interrogatory, I decided to conduct another small test. The results are reported in Attachment 1 to Response to USPS/DFC-5. This one-week test reveals that delivery to Emeryville has improved since my last systematic test in May and June 1995. However, delivery still is unreliable. On Friday, October 11, I mailed three pieces of test mail from San Francisco to Berkeley and three pieces from San Francisco to Emeryville. (Berkeley and Emeryville are in San Francisco's overnight delivery area.) All three items arrived in Berkeley on Saturday, October 12, while none arrived in Emeryville. This unreliable, sporadic service is unacceptable, especially when mail that should be delivered on Saturday is not delivered until Monday, two days later. (In this case, Monday is Columbus Day, so the earliest that this mail can arrive is Tuesday.)

In July, I also tested delivery of flats to my box in Berkeley (94712), my box in Emeryville (94662), and my

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street address in Emeryville (94608). The results are summarized in Attachment 2 to Response to USPS/DFC-5. This test provides further support for my testimony that delivery of flats in Berkeley is poor, as the flats I mailed to Berkeley were delayed on all four occasions. See my testimony, DFC at 7-8. This test also reveals that delivery to my box in Emeryville is unreliable: while delivery of flats to Emeryville was better than to Berkeley, the flat that I mailed on July 10 did not arrive until July 15.

I am not an expert on statistical sampling methods, so I cannot provide confidence intervals for my tests. However, I do know that Berkeley outperforms Emeryville noticeably every time I test delivery of first-class letters. Indeed, I believe that the failure of the three pieces of test mail that I mailed on October 11 to arrive in Emeryville on October 12 provides strong support for my contention that service in Emeryville is insufficiently reliable for my needs.

**DELIVERY TEST OF FIRST-CLASS MAIL
WEEK OF OCTOBER 8-12, 1996**

Item	Date Mailed	From	To Box In . . .	Received	On-Time?	Days Late
Postal Card	10/7/96	Berkeley	Berkeley	10/8/96	Yes	
Postal Card	10/7/96	Berkeley	Emeryville	10/8/96	Yes	
Postal Card	10/8/96	Emeryville	Berkeley	10/10/96	No	1
Postal Card	10/8/96	Emeryville	Emeryville	10/10/96	No	1
Envelope	10/8/96	Emeryville	Berkeley	10/9/96	Yes	
Envelope	10/8/96	Emeryville	Emeryville	10/9/96	Yes	
Postal Card	10/9/96	Berkeley	Berkeley	10/10/96	Yes	
Postal Card	10/9/96	Berkeley	Emeryville	10/10/96	Yes	
Postal Card	10/10/96	Emeryville	Berkeley	10/11/96	Yes	
Postal Card	10/10/96	Emeryville	Emeryville	10/11/96	Yes	
Postal Card	10/11/96	San Francisco	Berkeley	10/12/96	Yes	
Postal Card	10/11/96	San Francisco	Berkeley	10/12/96	Yes	
Postal Card	10/11/96	San Francisco	Emeryville	Not rec'd as of 10-14-96	No	?
Postal Card	10/11/96	San Francisco	Emeryville	Not rec'd as of 10-14-96	No	?
Letter	10/11/96	San Francisco	Berkeley	10/12/96	Yes	
Letter	10/11/96	San Francisco	Emeryville	Not rec'd as of 10-14-96	No	?

DELIVERY TEST OF FIRST-CLASS FLATS

Date Mailed	From	Collection Time	To	Received	On-Time?	Days Late
7/10/96	Emeryville	5:00 PM	94608	7/12/96	No	1
7/10/96	Emeryville	5:00 PM	94662	7/15/96	No	4
7/10/96	Emeryville	5:00 PM	94712	7/12/96	No	1
7/12/96	Emeryville	5:00 PM	94608	7/13/96	Yes	
7/12/96	Emeryville	5:00 PM	94662	7/13/96	Yes	
7/12/96	Emeryville	5:00 PM	94712	7/15/96	No	2
7/12/96	San Francisco	6:00 PM	94608	7/13/96	Yes	
7/12/96	San Francisco	6:00 PM	94662	7/13/96	Yes	
7/12/96	San Francisco	6:00 PM	94712	7/15/96	No	2
7/16/96	Emeryville	5:00 PM	94608	7/17/96	Yes	
7/16/96	Emeryville	5:00 PM	94662	7/17/96	Yes	
7/16/96	Emeryville	5:00 PM	94712	7/18/96	No	1

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USPS/DFC-6. Please refer to your testimony at page 4, lines 20 to 21. How are you "similarly situated" to people who live in Berkeley, given that you do not live in Berkeley?

RESPONSE:

I do not accept the apparent premise in the question that the definition of "similarly situated" depends on whether I live in Berkeley versus Emeryville. As a resident of Emeryville, I believe, for the following reasons, that I am similarly situated to residents of Berkeley:

(i) My residence is located only 0.5 miles, via common city streets, from the southern city limit of Berkeley.

(ii) Berkeley and Emeryville both are in Alameda County.

(iii) Most residents of Berkeley and Emeryville are represented by the same congressman and the same representatives in the state legislature.

(iv) Residents of Berkeley and Emeryville face similar problems related to crime, traffic, and general living conditions in the East Bay.

(v) Residents of Berkeley shop in Emeryville. Residents of Emeryville shop in Berkeley. Typically, each city's commercial establishments offer some products or services that the other city's establishments don't--and vice versa.

(vi) I work at the University of California, Berkeley. Many of the approximately 40,000 students, faculty, and staff live in Berkeley. All of us spend a majority of our daytime lives in the same location and face many similar issues related to transportation and personal safety.

(vii) Residents of Berkeley and residents of Emeryville both share equally in the right to be free from undue or unreasonable discrimination by the Postal Service among users of the mail when the Postal Service establishes fees. See 39 U.S.C. § 403(c).

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USPS/DFC-7. Please refer to your testimony at page 5.

(a) Please provide any documentation underlying your testimony on the hours of operation at the facilities you refer to on this page.

(b) Do the hours you report represent the only hours in which access to post office boxes at these facilities is possible? How do you know?

RESPONSE:

(a) I placed phone calls to the main customer-service telephone numbers for the Postal Service in Oakland and San Francisco. I informed the representative who answered that I needed to determine how late the box lobbies were open, and on which days of the week box lobbies were open, at stations and branches in their city. The representative in Oakland gave me the information for Monday through Friday, Saturday, and Sunday, then mailed me a chart that showed the same information.¹ See Attachment 1 to Response to USPS/DFC-7. The representative in San Francisco read the hours of various box lobbies to me over the telephone but did not have the information in a hard-copy form that she could send me. I am confident that the information she gave me was accurate, as we spent over 10 minutes on the telephone as she scrutinized her information closely and read the hours of several stations to me over the phone. The information also was consistent with my own observations of hours of stations in San Francisco.

If the Postal Service has any concerns about the reliability or accuracy of my information, the Postal

¹When I received the chart, I did discover one discrepancy. The station at Mills College also is open 24 hours a day. I do believe, however, that this post office is not necessarily accessible to the general public, as a guard station exists at the entrance to Mills College, an all-female college.

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Service should consider DFC/USPS-T4-1 and the Postal Service's response thereto.

(b) As far as I know, boxholders do not have access to their post-office boxes except as I indicated in my testimony at page 5, lines 11-28. I have not seen indications at any post offices that I have visited in San Francisco or Oakland that boxholders have access to their boxes except during the hours that are posted for the box lobbies.

Customer Satisfaction Index (CSI)

In the beginning of September, Opinion Research Corp., Princeton, N.J., mailed questionnaires to 6,000-6,000 randomly-selected households in each of 170 locations. They were asked to rate the Postal Service on overall performance (Excellent/Very Good/Good/Fair/Poor) and 37 service aspects, from Letter Carrier and Window Clerk service to parking space availability, complaint handling and courtesy received. In Oakland, 62 percent — three points up from 79% one year ago — of all households said overall satisfaction was "Excellent/Very Good/Good".

External First-Class Measurement System (EXFC)

How is our First-Class Mail service? To find out, Price Waterhouse, Washington, D.C., independently measures service performance for First-Class Mail from deposit to delivery (collection box to mail slot) in 96 locations. The latest EXFC results for the Oakland Post Office indicate 83 percent of First-Class letters destined for addressees within their overnight area were delivered on time. That figure is up 5 points from last year's 80%.



STATION	Window Service Hours	PO Box Lobby Hours	Early Bird Hours	Holiday Hours Dec 1-24	Notice Left Early Pick-up Hours	Last Collection Pick-up Times	Box Mail Available	Passport Forms Available	Passport Processing	Philatelic Center	PO Box	Self-Service Vending Machines
AIRPORT 8495 Pardee Dr	M-F 8:30am-5pm Sat closed	M-F 6am-6pm Sat 6am-3 pm	M & F 7am-5pm	Dec 10 & 17 8:30am-2pm	M & F 7 am-5 pm	M-F 7 pm Sat 5 pm	9:30 am	•			••	•
ARMY TERMINAL Bldg 640 (On Base)	M-F 10am-4pm Sat closed					M-F 3 pm Sat 1 15 pm		•				
CIVIC CENTER 201 13th St	M-F 8:30am-5pm Sat 8am-2pm	M-F 6am-6pm Sat 6am-3 pm	Tu & F 7am-5pm	M-F 'til 6 pm	Tu & F 7 am-5 pm	M-F 7 pm Sat 5 pm	10 am	•		•	••	•
DIMOND 2226 MacArthur Blvd	M-F 8:30am-5pm Sat 8am-2pm	M-F 7am-5pm Sat 7am-2pm				M-F 6:45 pm Sat 5 pm	9 30 am	•			•	•
EASTMONT 8033 MacArthur Blvd	M-F 9am-5pm Sat 9am-1pm	M-F 6am-6pm Sat 6am-3pm	M & F 7am-5pm		M & F 7 am-5 pm	M-F 6:30 pm Sat 5 pm	9 am	•			••	•
EMERYVILLE 1585 62nd St	M-F 8:30am-5pm Sat 8:30am-1:30pm	M-F 6am-6pm Sat 6am-3:30pm	Tu & F 7am-5pm		Tu & F 7 am-5 pm	M-F 6:30 pm Sat 5 pm	8:30 am	•			••	•
FRUITVALE 1445 34th Ave	M-F 8:30am-5pm Sat 8am-2pm	M-F 8:30am-5pm Sat 8am-2pm		M-F 'til 5 30 pm		M-F 7 pm Sat 5 pm	10 am	•			••	•
GRAND LAKE 490 Lakepark Ave	M-F 8:30am-5pm Sat 8am-2pm	M-F 7am-5pm Sat 7am-2pm	Tu & Th 7am-5pm		Tu & Th 7 am-5 pm	M-F 7 pm Sat 5 pm	9 am	•			••	•
KAISER CENTER 300 Lakeside Dr (Mezz)	M-F 9:30am-5:30pm Sat closed					M-F 5:30 pm Sat closed		•				•
LAUREL 3521 Maybelle Ave	M-F 8:30am-5pm Sat 8:30am-1:30pm	M-F 6am-6pm Sat 6am-2:30pm	W & F 7am-5pm		W & F 7 am-5 pm	M-F 6:30 pm Sat 5 pm	10 am	•			•	•
MAIN OFFICE 1675 7th St	11-5 4-8 *	Every day 24 hrs		Mon from 6 am		Every day 8 pm	8:30 am	•	•		•	•
MARCUS FOSTER 201 E 14th St	M-F 8:30am-5pm Sat 8am-2pm	M-F 8:30am-5pm Sat 8am-2pm				M-F 6:30 pm Sat 5 pm	9 30 am	•			•	•
MILLS COLLEGE CAMPUS 5000 MacArthur Blvd	M-F 9am-3pm Sat closed	Every day 24 hrs				M-F 5 pm Sat 4 15 pm	10 am	•			••	•
NAVAL HOSPITAL (BASE) 8750 Mountain Blvd	M-F 8:30am-3pm Sat closed					M-F 5 pm Sat 4:30 pm		•				
NAVAL SUPPLY CENTER Bldg 221 (Base)	M-F 10am-3:45pm Sat closed					M-F 4 pm Sat 1 pm		•				
NORTH OAKLAND 4869 Telegraph Ave	M-F 8:30am-5pm Sat 8:30am-1:30pm	M-F 6am-5:30pm Sat 6am-3pm	Tu & F 7am-5pm		Tu & F 7 am-5 pm	M-F 7 pm Sat 5 pm	10 am	•			••	•
PIEDMONT 195 41st St	M-F 8:30am-5pm Sat 8:30am-1:30pm	M-F 6am-6pm Sat 6am-3pm	M & F 7am-5pm	M-F 'til 5:30 pm	M & F 7 am-5 pm	M-F 7 pm Sat 5 pm	9 am	•			•	•
STATION B 1446 Franklin St	M-F 9am-5pm Sat closed					M-F 7 pm Sat 5 pm		•				•
STATION C (EMPORIUM) 20th St & Broadway	M-F 10am-6pm Sat closed	CLOSED	M-F from 9 am			M-F 5 pm Sat closed		X	CLOSED			
STATION D 560 14th St	M-F 8:30am-5pm Sat closed	M-F 7am-5pm Sat closed				M-F 7 pm Sat 5 pm	10 am	•			•	•
STATION E 1954 Mountain Blvd	M-F 8:30am-5pm Sat 8am-2pm	M-F 7am-5pm Sat 7am-2pm		M-F 'til 5 30 pm		M-F 6:30 pm Sat 5 pm	10 am	•			•	•
WEST GRAND ANNEX 577 West Grand Ave	M-F 10:30am-6:30pm Sat 10:30am-2:30pm					M-F 6:30 pm Sat 5 pm						•
CONTRACT #3 5337 College Ave	M-F 9:30am-5:30pm Sat 9:30am-3:30pm					M-F 5 pm Sat 2 pm						
CONTRACT #5 341 9th St (Chinatown)	M-F 9:30am-5:30pm Sat 9:30am-3:30pm					M-F 6:30 pm Sat 3:30 pm						
CONTRACT #7 3351 Grand Ave	W-Sat 10am-5pm					M-F 5 pm Sat 4:15 pm				•		

* Continuous service from 8:30 am Monday through 10:00 pm Friday

•• PO Boxes available to rent



PHONE NUMBERS CUSTOMER SERVICE INFORMATION (510) 251-3360, RATE INFORMATION: (510) 251-3300

Attachment 1 to Response to USPS/DFC-7

**DOUGLAS F. CARLSON
RESPONSE TO INTERROGATORIES
OF THE UNITED STATES POSTAL SERVICE**

USPS/DFC-8. Please refer to your testimony at page 7, lines 4 to 7.

(a) Please estimate how much less a box in Berkeley is worth to you than your box in Walnut Creek.

(b) If your box in Berkeley is worth less than your previous box in Walnut Creek, why are you obtaining box service in Berkeley rather than Walnut Creek?

RESPONSE:

(a) I do not know, as I have never quantified the value to me of box service. I do not believe that I can reliably ascertain the value of box service until a particular price is presented to me and I must decide whether to renew at that price or cancel my box. I can, however, recognize when the quality of service is higher in one post office than another.

(b) I have a box in Berkeley instead of Walnut Creek for the same reason why I moved from Walnut Creek to Emeryville. When I lived in Walnut Creek, my commute to and from work in Berkeley was 30 to 60 minutes each way. (Walnut Creek and Berkeley are 12 miles apart.) I was tired of the commute. Now that I live in Emeryville, my commute is an easy 15 minutes each way via city streets. Thus, using a box in Walnut Creek would be impractical and would defeat my purpose in moving. When I testified that my nonresident box in Berkeley is worth less to me than my previous box in Walnut Creek, I was comparing the value to me of my box in Berkeley now that I live in Emeryville with the value of my box in Walnut Creek while I lived in Walnut Creek. Therefore, holding constant my residence in Emeryville, a box in Walnut Creek would not be more valuable to me than a box in Berkeley because Walnut Creek is 15 miles away--even though service and lobby hours were better in Walnut Creek.

**DOUGLAS F. CARLSON
RESPONSE TO INTERROGATORIES
OF THE UNITED STATES POSTAL SERVICE**

USPS/DFC-9. Please refer to your testimony at page 10, lines 20 to 24. How much less than \$40 would a box at the Laurel Station be worth to Valerie Horwitz?

RESPONSE:

Valerie Horwitz reports that she would not obtain a box at the Laurel Station in Oakland even if the price were lower because the location is not safe and the lobby hours are too short. She also added that if the Postal Service imposed a nonresident fee and, thus, raised the fee she pays now for her box in San Francisco, "especially in such an arbitrary way," she would be likely not to use a post-office box and instead to receive mail delivery at home, despite the risk of theft.

DECLARATION

I, Douglas F. Carlson, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Dated: October 14, 1996



DOUGLAS F. CARLSON

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the Rules of Practice and sections 3(B)(3) and 3(C) of the Special Rules of Practice.



DOUGLAS F. CARLSON

October 14, 1996
Emeryville, California